

1 PAUL J. PASCUZZI, State Bar No. 148810  
2 JASON E. RIOS, State Bar No. 190086  
3 THOMAS R. PHINNEY, State Bar No. 159435  
4 FELDERSTEIN FITZGERALD  
5 WILLOUGHBY PASCUZZI & RIOS LLP  
6 500 Capitol Mall, Suite 2250  
7 Sacramento, CA 95814  
8 Telephone: (916) 329-7400  
9 Facsimile: (916) 329-7435  
10 Email: ppascuzzi@ffwplaw.com  
11 jrios@ffwplaw.com  
12 tphinney@ffwplaw.com

7 ORI KATZ, State Bar No. 209561  
8 ALAN H. MARTIN, State Bar No. 132301  
9 SHEPPARD, MULLIN, RICHTER & HAMPTON LL  
10 A Limited Liability Partnership  
11 Including Professional Corporations  
12 Four Embarcadero Center, 17<sup>th</sup> Floor  
San Francisco, California 94111-4109  
Telephone: (415) 434-9100  
Facsimile: (415) 434-3947  
Email: okatz@sheppardmullin.com  
amartin@sheppardmullin.com

13 Attorneys for The Roman Catholic Archbishop of  
14 San Francisco

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 | In re Case No. 23-30564

## 18 THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO,

## Debtor and Debtor in Possession.

## Chapter 11

## Chapter 11

**NOTICE OF HEARING ON DEBTOR'S  
MOTION FOR ENTRY OF AN ORDER  
REFERRED PARTIES TO GLOBAL  
MEDIATION, APPOINTING MEDIATOR  
AND GRANTING RELATED RELIEF**

Date: June 13, 2024

Time: 1:30 p.m.

Location: via Zoom

Judge: Hon. Dennis Montali

26 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY  
27 JUDGE, THE UNITED STATES TRUSTEE, AND ALL CREDITORS AND PARTIES IN  
28 INTEREST:

1           **PLEASE TAKE NOTICE** that a hearing (the “Hearing”) to be conducted via  
2 videoconference has been schedule for June 13, 2024, at 1:30 p.m. before the Honorable Dennis  
3 Montali, United States Bankruptcy Judge, to consider the *Motion for Entry of an Order Referring*  
4 *Parties to Global Mediation, Appointing Mediator, and Granting Related Relief* (the “Motion”)<sup>1</sup>  
5 filed by The Roman Catholic Archbishop of San Francisco (“Debtor,” or the “RCASF”), the Debtor  
6 and Debtor in Possession in the above-captioned case (the “Bankruptcy Case”), on May 15, 2024.

7           **PLEASE TAKE FURTHER NOTICE** that the by this Motion, the Debtor requests that  
8 the Court refer, pursuant to Bankruptcy Code sections 105(a), 363(b), 502(b) and 541, and FRBP  
9 1001, the Mediation Parties to mediation of the Mediation Matters and to appoint the Hon.  
10 Christopher S. Sontchi (Ret.) and Hon. Daniel J. Buckley (Ret.) as mediators for all issues and  
11 disputes (collectively, the Mediation Matters as defined more particularly below and in the Motion)  
12 to be resolved among the Mediation Parties.

13           In support of the Motion, the Debtor also filed the declarations of Judges Sontchi and  
14 Buckley concurrently with the Motion. As defined in the Motion, the Mediation Parties are the  
15 Debtor, the Committee, the Insurers, the Non-Debtor Catholic Entities (including all entities for  
16 whom the Debtor will require protection for it to exit this Chapter 11 Case), the unknown claimants’  
17 representative, once appointed, and any other person or entity that the Mediator or the Mediation  
18 Parties determine is necessary or appropriate to participate in the mediation. Also as defined in the  
19 Motion, the Mediation Matters include, but are not limited to: (a) the terms of a consensual chapter  
20 11 plan of reorganization; (b) the terms of a channeling injunction to benefit any party making a  
21 contribution to the chapter 11 plan of reorganization; (c) the resolution of any disputes related to  
22 coverage or alleged coverage provided by any of the Insurers; (d) the assessment of claim credibility,  
23 valuation and the Debtor’s potential legal liability for the Abuse Claims; (e) contributions by the  
24 Debtor, Non-Debtor Catholic Entities, and Insurers to fund any reorganization plan; (f) the  
25 development of a claims submission and evaluation process for administration of future claims by  
26 a post-confirmation trust; (g) the payment of claims issues including future claims of currently

27           

---

<sup>1</sup> Capitalized terms not otherwise defined in this notice shall have the same meanings ascribed to  
28 them in the Motion.

1 unknown claimants; (h) non-monetary plan provisions; and (i) the resolution of any other issue  
2 necessary to determine the rights of the parties to reach agreement on the terms of a confirmable  
3 consensual plan of reorganization.

4 **PLEASE TAKE FURTHER NOTICE** that this notice does not contain all the particulars  
5 of the Motion or supporting documents, nor does it summarize all of the evidence submitted in  
6 support of the Motion. For further specifics concerning the Motion and the relief requested, you are  
7 encouraged to review the Motion and the supporting evidence, including the supporting  
8 declarations, copies of which may be obtained from the website to maintained by the Debtor's  
9 Claims Agent Omni Agent Solutions Inc. at <https://omniagentsolutions.com/RCASF>. You may also  
10 access these documents from the Court's Pacer system (requires a subscription). The web page  
11 address for the United States Bankruptcy Court for the Northern District of California is  
12 <http://www.canb.uscourts.gov>.

13 **PLEASE TAKE FURTHER NOTICE** that the Hearing will not be conducted in the  
14 presiding judge's courtroom but instead will be conducted by videoconference via ZoomGov. The  
15 Bankruptcy Court's website provides information regarding how to arrange an appearance at a video  
16 or telephonic hearing. If you have questions about how to participate in a video or telephonic  
17 hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on  
18 the Bankruptcy Court's website. The link to the judge's electronic calendar is:  
19 <https://www.canb.uscourts.gov/judge/montali/calendar>.

20 **PLEASE TAKE FURTHER NOTICE** that any opposition or response to the Motion must  
21 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtor at the above-  
22 referenced addresses so as to be received by **May 30, 2024**. Any opposition or response must be  
23 filed and served on the Limited Service List as provided in the *Interim Order Granting Debtor's*  
24 *Emergency Motion to (1) Establish Notice Procedures, (2) File Confidential Information Under*  
25 *Seal, and (3) Temporarily Suspend Deadline for Filing Proofs of Claims* at ECF No. 38. The  
26 updated Limited Service List may be obtained from the Omni Agent Solutions Inc. website listed  
27 above. Failure to timely file opposition and appear at the Hearing may constitute a waiver of your  
28

1 objections. Your rights may be affected. You should read these papers carefully and discuss them  
2 with your attorney, if you have one in this Bankruptcy Case. If you do not have an attorney, you  
3 may wish to consult one.

4 Dated: May 15, 2024

5 FELDERSTEIN FITZGERALD WILLOUGHBY  
6 PASCUZZI & RIOS LLP

7

8 By /s/ Paul J. Pascuzzi

9 PAUL J. PASCUZZI  
10 JASON E. RIOS  
11 THOMAS R. PHINNEY  
12 Attorneys for The Roman Catholic  
Archbishop of San Francisco

13 Dated: May 15, 2024

14

15 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

16

17 By /s/ Ori Katz

18 ORI KATZ  
19 ALAN H. MARTIN  
20 Attorneys for The Roman Catholic  
21 Archbishop of San Francisco

22

23

24

25

26

27

28